

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LISA BARBOUNIS, :
Plaintiff, : CIVIL ACTION
NO. 2:19-cv-05030-JDW
v. :
OPPOSITION TO DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT
THE MIDDLE EAST FORUM, GREG :
ROMAN, AND DANIEL PIPES, :
Defendants. :
:

DECLARATION OF LISA REYNOLDS-BARBOUNIS

I Lisa Reynolds-Barbounis who resides at 1820 Kilbourne Place, Northwest, Washington D.C. 20010, in the United States of America do hereby make OATH and say at follows:

1. My name is Lisa Reynolds-Barbounis.
2. Today is April 17, 2021.
3. I began my employment for Defendants, The Middle East Forum sometime around October 2017, and continued my employment until my involuntary resignation around August 2019.
4. My resignation was void of free will. I left because the work environment was so intolerable that any reasonable person in my position would have resigned.
5. From October 2017 until November 5, 2018, my title was Executive Liaison.
6. I was Defendant, Greg Roman's personal assistant.
7. I managed Roman's schedule and performed research projects.

8. In November 2018, Roman was required to discontinue visiting the Philadelphia offices, after the female employees including myself, Marnie Meyer-O'Brien ("Ms. O'Brien"), and Patricia McNulty ("Ms. McNulty) reported Greg Roman's discrimination and harassment in the workplace.
9. The discrimination and harassment was ongoing, continuous and without respite and began as early as my job interview and continued until November 2018.
10. I also witnessed Greg Roman sexually harass my female coworkers.
11. Defendants have responded to my lawsuit claims of sexual harassment, retaliation, and hostile work environment by initiating a campaign of retaliation beginning November 2018.
12. The campaign of retaliation includes using the civil legal process to file three lawsuits against me.
13. Daniel Pipes has informed me in person during a meeting at 30th Street Train Station in Philadelphia, Pennsylvania that all of these lawsuits can end if I simply discontinues my sexual harassment suit in this Court.
14. During my employment Greg Roman constantly spoke to me about sex and used sexual innuendos
15. Greg Roman made comments suggesting sex and needing a release.
16. Greg Roman placed his hands on me during the AIPAC conference and forced her head toward his penis area.
17. Greg Roman sexually assaulted Patricia McNulty in front of me.
18. While violently forcing Patricia McNulty onto his lap, Greg Roman whispered sexual suggestions in her ear. This was difficult for me to hear, however, Patricia McNulty was scared and told me what he said after the incident.

19. Greg Roman compelled me to share a residence with him in a foreign country by lying to me and promising that I would have my own living space and my own bathroom.
20. Greg Roman made unwelcome physical contact of a sexual nature with me on at least two occasions and always put his hands on my in a work environment.
21. Greg Roman subjected me to angry, violent, inappropriate sexual suggestions, yelling that he needed a blow job.
22. Greg Roman physically harassed me and co-workers in front of me.
23. Greg Roman leered at my breasts and butt all the time.
24. Greg Roman intentionally pitted me against other employees including Marnie Meyer who was the Director of Human Resources.
25. Greg Roman made it difficult for me to communicate with Marnie Meyer so we would not discuss shared experiences.
26. Greg Roman punished by yelling at and becoming angry any employees who suggested or attempted to communicate with Defendant Pipes directly.
27. Greg Roman threatened ongoing monitoring of devices and security cameras.
28. Greg Roman invited me to his home and stating his wife would not be present and that his kids would not be present. This occurred on many occasions throughout my employment and between October 2017 and November 2018.
29. I was informed that Greg Roman exposed his penis to female a reporter that I associated with. I made a recording of the reporter describing the incident.
30. Greg Roman informed me that he compelled a young intern named Leah Merville to engage in sexual intercourse with him and then graphically describing the sex acts to me. He said that she ride his cock and gave a great blowjob.

31. I was informed by Greg Roman and Matthew Bennett that employees who reports sexual harassment or went up against Greg Roman were terminated.
32. I was informed that MEF would threaten litigation for employees who reported Greg Roman.
33. These are some of the highlights of the sexual harassment to which I was subjected by Greg Roman between October 2017 and November 2018.
34. Defendant Roman's sexual harassment began during my job interview and continued until November 2018, after which point Roman used his position to subject me to retaliation.
35. Greg Roman started sex-based rumors about female employees who I worked with.
36. I suffered ongoing stress, trauma, psychological harm and difficulty with her work and work relationships due to the harassment such that I sought help from medical professionals.
37. From November 2018 through March 2019, Greg Roman did not have sex-based comments toward me, however, he complained about my work to Daniel Pipes and made false comments about me not performing my job duties.
38. After Greg Roman was permitted to return to full duties in March 2019, he began to use his power and position to retaliation against me further.
39. Greg Roman lied to Daniel Pipes about me and made false statements about my work from between March 2019 and my employment ending. I was admonished by Daniel Pipes due to false statements that Greg Roman made to Daniel Pipes during project directors calls.
40. Defendant Pipes clearly articulated his hands-off management policy and deferred almost complete authority to Defendant Roman to handle all management matters. Greg Roman yelled at, became angry and maintained a policy that prevented employees from reporting anything directly to Daniel Pipes.

41. I spoke with Matthew Bennett about discrimination and harassment in the workplace involving Greg Roman. Both me and Patricia McNulty spoke to Matthew Bennett on more than one occasion. Matthew Bennett suggested that I could go to Daniel Pipes with the report. Matthew Bennett also informed me and Patricia McNulty about other female employees who had reported discrimination and harassment in the workplace. Matthew Bennett pointed that they were no longer employed but that Greg Roman was still the Director.

42. Mathew Bennett told me and Patricia McNulty about the following female employees who reported issues related to Greg Roman: (1) Tiffany Lee, (2) Laura Frank, and (3) Lara Scott, and (4) Iman Patel.

43. Matthew Bennett told me and Patricia McNulty that he had been asked to back up Roman and to discredit Tiffany Lee's reports of sexual harassment.

44. Matthew Bennett suggested that I could tell Daniel Pipes, however, he did not want to tell Daniel Pipes himself. Matthew Bennett was also afraid to report issues against Greg Roman.

45. Matthew Bennett told me that Greg Roman did engage in a sexual relationship with Tiffany Lee. Mr. Bennett informed me that Roman and Ms. Lee had sex on the couch in her office and that Roman liked her breasts.

46. After Marnie O'Brien, Patricia McNulty and I reported discrimination and harassment in the workplace, Daniel Pipes scheduled a group meeting where he invited the entire Philadelphia office to attend and be part of the meeting. Stacy Roman and Greg Roman were invited however, Greg Roman did not attend because the day of the meeting Pipes instructed him to stay home.

47. Due to the group meeting format, I was nervous and did not feel comfortable opening discussing private and personal issues related to sexual harassment. I particularly did not feel comfortable talking about graphic sexual comments by Greg Roman in front of Greg Roman little sister, Stacy Roman.

48. Greg Roman was brought back to his full position as Director of The Middle East Forum by March 2018.

49. When told about Greg Roman's sexual harassment in November 2018, Daniel Pipes actually said, "I have seen priests who molest kids do worse and keep their jobs."

50. Daniel Pipes informed us that he would not take any action to investigate or correct issues involving Greg Roman for anything related to pre-November 2018 conduct and comments.

51. I am aware through my employment with the Middle East Forum of at least nine (13) women who have lodged allegations of sexual harassment and/or sex and gender discrimination involving Greg Roman. They are (1) Laura Frank, (2) Lara Scott, (3) Tiffany Lee, (4) Marie O'Brien, (5) Patricia McNulty, (6) Leah Merville, (7) Alana Goodman, and myself (8) Lisa Barbounis, (9) Caitriona Brady, (10) Delaney Yonchek, (11) Samantha Mandeles, and (12) Iman Patel.

52. All the female employees have either informed me or I have heard that they were terrified of Greg Roman and MEF's willingness to retaliate against victims of Greg Roman. The victims of Greg Roman are aware of his propensity to attack anyone who tried to report discrimination and harassment in the workplace.

53. Defendant, Roman made it clear that he was always watching and could access private information on personal phones and other devices. Patricia McNulty actually sent screen shots to her sister to safeguard, of text communications where I and Patricia McNulty

discussed Greg Roman's sexual harassment. I and Patricia McNulty were afraid to even have private text messages discussing Greg Roman's sexual harassment on our phones. We thought that Greg Roman could hack into our devices, access the conversations, and retaliate. Ms. McNulty and I were not paranoid. This fear was born for actual threats Roman made to the female staff. Roman performed threatening demonstrations to prove he could hack a personal device and access private information. Roman also used and referred surveillance he placed around the office and bragged about his access to their email accounts, instant messaging accounts and devices.

54. We were told about or witnessed several women who faced termination as a result of raising complaints against Defendant Roman. These women included (1) Tiffany Lee, (2) Laura Frank, (3) Lara Szott, and (4) Iman Patel.
55. I was subjected to an ongoing, continuous pattern of sexual harassment and sex and gender discrimination which began at my job interview and continued until November 2018, when Roman was temporarily removed from the Philadelphia offices.
56. During the temporary period while Roman was out of the office, I was not subjected to sexual harassment however, when Roman returned to full duties in March 2019, the retaliation, discrimination and harassment in the workplace resumed and got worse until I had to resign her position in August 2019.
57. The pervasiveness of Defendant, Greg Roman's sexual harassment, to which I was subjected, reached its peak between August and November 2018.
58. The severe and pervasive sexual harassment during this time period led to the reports to Daniel Pipes in November 2018.
59. Roman's sexual harassment began in October 2017, and continued to October 2018

60. I was subjected to sex-based comments and sex-based physical contact, forcing me to watch when colleagues were harassed.
61. Greg Roman incessantly spoke about sex and my sex life.
62. Greg Roman constant made comments that any reasonable person would take as sexual suggestions including talking about how he liked sex, my sexual preferences.
63. Greg Roman put hands on me while in the office, leered at my chest and backside.
64. Greg Roman forced me to watch inappropriate videos and images and spoke about sex.
65. Greg Roman asked me to visit his home “when my wife won’t be here.”
66. Greg Roman constantly referred to me as his “work wife,” commented on women’s “big tits,” describing sex and sexual conquests.
67. Greg Roman and Matthew Bennet told me I was hired because of my looks and because I was hot.
68. Greg Roman spoke about women he had “fucked,” saying “I wish I could still fuck all those girls,” complaining that he was not sexually gratified, complaining that his wife could not sexual gratify him, saying that his wife was not “hot enough,” saying that he should be permitted to continue “fucking hot chicks,” talking about sex.
69. Greg Roman spoke about sex while forcing me to sit inappropriately close to him, creating scenarios to get me alone and then refusing to discuss work related issues, talking about another employee who gave a great blowjob.
70. Greg Roman ordered me to give him a release, invited me to his home late at night, called me late at night, asked questions about my sexual preferences, and generally tried to convince me to engage in a sexual relationship.

71. Greg Roman's conduct and comments continued past August 2018 and into September and October 2018.
72. I was never provided with the role Director of Communication in substance or meaningfulness. Daniel Pipes informed me that I could hold myself out to the outside world with that title but he was very clear that I was not the Director of Human Resources.
73. I never stopped acting as a personal assistant and scheduling calendars and doing grunt work like research or go-for work.
74. Daniel Pipes and Greg Roman control all aspects of operation and management of The Middle East Forum. Daniel Pipes is the number 1 and Greg Roman is the number 2.
75. During my employment with MEF I worked with Matthew Bennett who was the Director of Development and the number 3 management level employee at MEF. Matthew Bennett and Greg Roman are also close friends who continued communicating after Bennett resigned his position from MEF and helped Greg Roman return to Director.
76. When Greg Roman stopped visiting the Philadelphia offices in November 2018, Mathew Bennett took over his day-to-day management of the Philadelphia offices.
77. I know Patricia McNulty from working at MEF. Since my employment with MEF ended, I have moved to Washington D.C., where I work for Congressman Randy Weber. I believe that Patricia McNulty works in New York.
78. I met Tommy Robinson when I was assigned by Greg Roman to assist Greg Roman with a grant that MEF provided to fund a "free Tommy Robinson" rally. I first met Tommy Robinson in person in October 2018. I have never worked for compensation for Tommy Robinson. I did volunteer to assist with him when he ran for parliament in the UK.

79. I met Daniel Thomas because MEF provided Daniel Thomas with a grant for a “free Tommy Robinson” rally. Prior to MEF providing that grant, I had never met Daniel Thomas before.
80. Daniel Thomas helped Tommy Robinson but in my experience he was only in charge of the one rally that occurred sometime around June 2018.
81. Jazmin Bishop is the biological mother of Daniel Thomas’s child, however, I am not aware of any ongoing relationship between them today.
82. MEF has used the civil litigation system as well as press to subject me to retaliation which began only after I filed my lawsuit against MEF in this Court.
83. I was informed by an individual named Jon, who said that Greg Roman had spoken to him about me and my lawsuit, that MEF has paid almost two million dollars in legal fees in the cases that MEF has filed against me and my case.
84. I was notified that MEF has a litigation war chest to fund the cases that were filed against me and my case.
85. Daniel Pipes sent me an email on December 3, 2020 asking to meet at 30th Street Train Station in Philadelphia, Pennsylvania. Daniel Pipes told me to come without counsel, and to turn off my phone.
86. Daniel Pipes explained his and MEF’s unlawful retaliatory strategy that Daniel Pipes, Greg Roman, and MEF were employing in response to my sexual harassment, sexual assault, and sex and gender discrimination.
87. Daniel Pipes informed me that he knows I am a good person and said that he thinks I have been taken advantage of by my lawyers.
88. Daniel Pipes tried to extort me and threatened to file additional claims against me unless I withdraw my case from the Eastern District of Pennsylvania.

89. Daniel Pipes told me that unless I withdrew my case, he would file more cases against me including a RICO lawsuit.

90. Daniel Pipes' said I have to withdraw my case with prejudice and then he would make all the cases against me go away.

91. Daniel Pipes continued to threaten and pressure me stating that "we have the same problem... your attorney."

92. Daniel Pipes told me I should fire my lawyers and he would help me with the cost of a bankruptcy lawyer and a credit counseling service to assist with the legal bills that I would owe.

93. Defendant, Pipes emailed me a proposed settlement agreement memorializing the above.

94. I did not agree to the unconscionable terms offered by Defendant, Pipes and on January 22, 2021, MEF filed yet another retaliatory lawsuit against me, alleging violations of the RICO statutes.

95. This RICO lawsuit failed to advance new factual averments not part of the other two lawsuits that MEF had already filed.

96. Greg Roman contacted an individual with whom I had previously been romantically involved: Daniel Thomas.

97. I heard a voice message recording left by Daniel Thomas where Greg Roman promised to provide to trade something to Daniel Thomas in exchange for Daniel Thomas lying about me. testimony and defamatory statements against Lisa Barbounis.

98. During a deposition of in the matter of MEF v. Lisa Barbounis, Defendants created an evidence mashup where they took different recordings of me and put them all together into a single recording and then played them for my husband.

99. The recordings were of different times and different conversations but they all were part of one large single recording that they must have used editing software to create.

100. There are text conversations in my phone between me and someone who works with MEF named Jonathan.

101. Jonathan contacted me and told me that Greg Roman had told him that he read the text conversations.

102. Jonathan said that Roman had asked him about the text messages after reading them.

103. These messages were on my device and must have been produced through the e-discovery order in this case.

104. Apparently Roman knew about the text messages.

105. Roman approached Jonathan to discuss the case.

106. Jonathan then approached me and tried to broker a sit down between me and Greg Roman. Jonathan informed me that Roman suggested I file a “malpractice claim” against my attorneys.

107. Jonathan also said The Middle East Forum had spent \$1.7 million dollars in legal fees to date.

108. During my employment with MEF, Greg Roman often made comments aimed to scaring the female staff by suggesting that there was danger or risk associated with working at MEF. During my employment I have not seen a single incident where anyone was threatened or where there appeared to be a risk to the safety of anyone who worked at MEF, other than from MEF’s Director and the employees who helped him avoid responsibility.

109. While there was some travel associated with my employment with MEF, it was not frequent for all employees and it was not a condition of employment.

110. Greg Roman treated the female employees differently than male employees and treated females different than males. Greg Roman did not employ equal treatment of MEF staff. Greg Roman was hostile, violent, inappropriate toward the female staff. The women who worked with Greg Roman felt like this including me.

111. Greg Roman did not demand the same commitment from staff as he demanded from himself. Greg Roman treated himself far different than staff. He used his position and decision-making authority to approve expenditures so that MEF donations covered costs for his travel, food, lodgings, and other expenses. Greg Roman demanded the female staff obey him in all things and became violent and threw things, screamed, yelled, cursed, and created tension and hostility when he felt he was not being obeyed in all things.

112. Pipes had little to no involvement in my employment until November 2018, when Roman was temporarily removed from working at the Philadelphia offices.

113. Prior to that Roman held ultimate and direct supervisory authority of all MEF female employees including me.

114. Roman was a strict, aggressive, and sometime violent manager and maintained a policy to prevent female employees from communicating in any way with Daniel Pipes.

115. Roman enforced a policy whereby female employees were not permitted to communicate directly with Defendant, Pipes.

116. Roman did not allow female employees to speak or bring issues directly to Defendant, Pipes without Roman's express approval and involvement, and he never provided said approval. All issues flowed through Roman's office.

117. Defendant, Pipes maintained a closed-door policy, even after the November 2018 staff meeting, where at least three female employees including the Director of Human Resources, Marnie Meyer, all reported sexual harassment involving Defendant, Greg Roman.

118. After the November 2018 staff meeting, Defendant, Daniel Pipes did not welcome and assist female employees with new reports of harassment involving Defendant, Greg Roman.

119. Defendant, Pipes' claim that Defendant, Roman was on a strict probation was false and misleading to the female staff because there were multiple reports of inappropriate conduct and reports of retaliation and Pipes refused to even consider any of the reports.

120. Defendant, Pipes refused to take any action in accordance with MEF's employee handbook and the written policy governing sexual harassment in the workplace and encouraged retaliation by forcing any victim of Greg Roman to deal directly with Greg Roman.

121. Defendant, Pipes refused to schedule meetings to discuss any new reports involving Defendant, Roman and said that he would do nothing about any report for conduct that may have predicated November 2018.

122. Daniel Pipes did not meet with me and make me feel welcome when my employment began October 2017. He made me feel like I was unwelcomed by telling me that he did not think I should have been hired because "I never needed an assistant and I do not understand why Greg needs an assistant." He did not tell me his door was always open.

123. Patricia McNulty, Matthew Bennett, Greg Roman, Marnie O'Brien, and myself traveled to Washington D.C., the weekend of the AIPAC conference, to attend events that were held conference weekend. The only reason we all traveled to D.C., that weekend was due to the

AIPAC conference and events that surrounded the same. For example, MEF hosted a dinner at the Cuba Libra restaurant and we all attended the dinner and used it as a networking event.

124. After we hosted the dinner we visited other events that were also held during the AIPAC conference weekend.

125. At the end of the evening, around the time when bars and restaurants close, I wanted to stay and talk to people and then travel back to my hotel room.

126. Greg Roman became aggrieve and yelled at us to “get in the car.”

127. We then traveled back to the Airbnb that Roman and Bennett had booked.

128. We remained at the Airbnb until about 8:00 A.M. So we were there for about five hours.

129. Roman had planned for the female employees, Patricia McNulty, Marnie O’Brien, and myself to stay at the Airbnb with him and Bennett. When Pipes learned he required the female employees to book their own hotel rooms to Roman’s disappointment.

130. In my experience, both from working at MEF in general and from working directly with Greg Roman and being subject to his sexual advances and suggestions, Roman has an MO, where he uses his position and authority to assign and direct work activities to create situations where he is alone with a female employee.

131. Greg Roman used Marijuana at the Airbnb and offered Marijuana and drinks to the female employees he had compelled t return to his room. There was no networking event or any planned event. Roman did not allow the female employees and specifically me to stay behind and return to my room. He ordered me to “get in the car.”

132. After returning to the Airbnb, Roman created a tense and uncomfortable atmosphere when he suddenly began ordering the male visitors to leave.

133. Greg Roman sat between Patricia McNulty and myself and put his arm around me and pulled me into him. My head was being pulled toward him.

134. He put his hand under Patricia McNulty and pulled her so hard she ended up on top of him.

135. He then began whispering in Patricia McNulty's ear.

136. I tried to make it clear to Greg Roman that his sexual advances and sex-based conduct and comments were not welcome. I did this physically when I would jerk away from him when he touched me. I did this with words when I would tell him to "stop being gross" or "stop being weird" or say, "that's not appropriate." I did this throughout my employment.

137. Matthew Bennett was not asked to travel to Israel with Greg Roman in March – April 2018. Greg Roman asked Marnie O'Brien to travel with him. Marnie O'Brien refused to go because Greg Roman would not allow her to stay in her own hotel room.

138. Greg Roman then asked me to go. I said I would go and stay in the same room as long as I could have my own living area with a bathroom.

139. When we got to Israel, it was clear that Roman knew that there was only one bathroom. He apologized to me about it as soon as we arrived at the room.

140. I was in communication with Matthew Bennett at the time and Greg Roman did not ask Bennett to go on the trip.

141. Greg Roman also conditioned the trip to Israel by telling me I could not tell anyone I was going and specifically Daniel Pipes or Greg Roman's wife. Roman made me hide when his wife called.

142. Greg Roman did not allow me to leave the room on my own until after I made it clear I would not engage in sexual acts including oral sex with him, which occurred in the final days

of the trip. After that Greg Roman was no longer interested in me staying around him and told me to go walk around on my own. I was relieved to have the time to be on my own.

143. While on the Israel trip Greg Roman became very angry. He said that he had propositioned a young female who was a former MEF intern for sex and she rejected his suggestions. He started yelling at me about needing a blow job. He also began a conversation with me about sex and needing sex and that he deserved sex. It was very scary. I contacted my husband and my coworker Patricia and told them both that Greg Roman was being inappropriate. Patricia McNulty asked if he was being “AIPAC couchish...” I slept with a knife under my pillow that night. I did not know what to do. I did not know if I should leave the room, fly home, go to the police. Because we were in the final nights of the trip I stayed in my room that night and I just flew home ASAP.

144. Greg Roman informed me during the trip to Israel that he “fucked” Leah Merville. He graphically described the sexual encounter saying that she “rode him” and that “her body was incredible” and that she “gave a great blowjob.”

145. Roman explained that he had sex with Leah Merville in a hotel room when he had to sign paperwork for her.

146. Greg Roman yelled about needing a blowjob and needing a release.

147. Roman said that he deserved to have sex with hot chicks and that his wife could not sexually gratify him.

148. I did not see any of the following people after the night when Greg Roman scared me by yelling at me about sex and needing oral sex: Ashley Perry, Gilad Ach, and Matan Peleg.

149. I do not believe that I met Ashley Perry, Gilad Ach, and Matan Peleg during the trip to Israel. If we did meet it was not in the final two days of the trip.

150. When Greg Roman yelled at me about needing a blow job, I told him to stop and I went to bed extremely scared. He was drunk, angry, and violent.

151. I never helped organize harassment training during my employment with MEF. I certainly do not recall attending harassment training.

152. After the trip to Israel Greg Roman continued to subject me to inappropriate conduct and comments. Roman also became hostile toward me and I noted that Roman began to pit me against Marnie Meyer, the Director of Human Resources.

153. I tried to work things out with Greg Roman who had started to complain about me to Marnie Meyer as part of the campaign of retaliation. So I sent Greg Roman a text message and invited him to talk directly to me if he had any problems with me. Greg Roman continued to subject me to retaliation and the hostile work environment escalated.

154. Greg Roman was dishonest with Marnie Meyer by informing Marnie Meyer about issues that Greg Roman never once brought up with me. For example, Greg Roman never accused me of failing to respond to donors. This was part of the way that Greg Roman drove a wedge between me and the Director of Human Resources.

155. In October 2018, I sat down with Marnie Meyer to discuss with her the issues and discord that had grown between us. When we openly explained our positions to one-another, it became apparent that Greg Roman was inciting discord intentionally.

156. Greg Roman told me to write up Marnie Meyer and then told on me to Marnie Meyer when I followed his instructions. This was one of the ways that Greg Roman drove a wedge between me and Marnie Meyer.

157. Marnie Meyer handwrote the letter to Daniel Pipes because she was scared that Greg Roman would use his knowledge of electronic devices to intercept the letter and retaliate against both of us.

158. I have never considered moving to London. I have never confided in Daniel Thomas about issues related to my work at MEF by telling him that I had a plan to move to London.

159. My entire life is in the United States including my family and children. The idea of me moving to Europe is ludicrous and I never considered moving there.

160. It never felt like Daniel Pipes took out reports of sexual harassment seriously. He told us that priests who molest children have done worse and kept their position in the church. He also was angry at the victims for “surprising” him.

161. The way that Daniel Pipes responded to the reports of sexual harassment felt derivative. He completed what he called “the investigation” in only one day. He was cold and seemed much angrier at the women than at Greg Roman.

162. The way he responded to the reports operated to silence and minimize the reports. Daniel Pipes clearly wanted to get the entire incident behind everyone and favored expediency over thoroughness. He organized a staff meeting where he expected the women who were sexually touched and harassed for years to talk about it all in front of the entire office.

163. Daniel Pipes invited Greg Roman and Stacy Roman to the meeting on November 5, 2018. Greg Roman did not attend but Stacy Roman was present and she is Greg Roman’s little sister.

164. It was very difficult to talk about personal issues related to sexual harassment in front of the harasser’s little sister.

165. Stacy Roman was visibly angry during the meeting and defended her brother. She said that it was possibly our faults for wearing short skirts.

166. I was scared to attend the meeting because I was told Greg Roman would be present. We did not learn that he was disinvited until the day of the meeting. Greg Roman was scheduled to attend until the female employees voiced their fear of talking about Greg Roman with him sitting right there.

167. One of the primary issues discussed at the meeting was Greg Roman's sexual harassment in the workplace. It was very difficult for anyone to get into detail because we did not want to talk about the details of Greg Roman's sexual misconduct in front of his little sister. But we certainly discussed sexual harassment during the meeting.

168. Even between November 2018 and March 2019, it was obvious that Greg Roman still had a significant role with MEF. We still had to respond to his demands and he was still running MEF behind the scenes.

169. I still had to communicate with Roman almost every day between November 2018 and March 2019. This was one of the reasons that I agreed to Matthew Bennett's suggestion that I go to Daniel Pipes and notify Pipes that Greg Roman could return on probation as Director of MEF. I was already communicating with him every day. So I thought that if it will help MEF, it won't really make a difference to me.

170. During this time period, Roman was clearly angry at the female individuals who had reported his sexual harassment in the workplace. And while he was clearly still angry, the sex-based comments stopped. After November 2018, I was subjected to retaliation, and discrimination because of my gender, however, I was no longer subjected to daily inappropriate sexual harassment and discussions about sex.

171. Matthew Bennett approached me and suggested that MEF would do a lot better if Greg Roman could return as Director of MEF in all aspects. Matthew Bennett assured me that he spoke to Greg Roman and he had learned his lesson. Matthew Bennett said this is what is best for MEF. Matthew Bennett also suggested that they idea should come from me as it would carry more weight if I brought the idea to Daniel Pipes.

172. At the time, Matthew Bennett and Greg Roman were in contact with one-another and they both agreed that I should bring the idea to Daniel Pipes.

173. MEF not doing as well and so I put my own self-preservation and self interest second and MEF first. I told Daniel Pipes that if Greg Roman stayed on probationary status and if some of the restrictions remained in effect, I could agree to Greg Roman becoming Director of MEF again.

174. Marnie Meyer never agreed to Greg Roman's return and said it was a bad idea.

175. Patricia McNulty was scared to have Greg Roman return, however, she acquiesced under strict conditions that Greg Roman was on probationary status and if he did anything adverse to the female staff, he would be ejected again permanently.

176. The probationary status was a sham and once back, Daniel Pipes refused to even consider a report of harassment or retaliation involving Greg Roman.

177. By spring 2019, it became apparent that I had no future with MEF. Greg Roman constantly provided false information to Daniel Pipes about my work and Daniel Pipes admonished me. I was partly performing the responsibilities of a employee in communications but because of my reports of discrimination and harassment in the workplace, Daniel Pipes refused to provide me with a promotion. My colleagues who reported discrimination were in similar positions. Patricia McNulty was promised a position

a Director of Development, however, Greg Roman withdrew the opportunity upon his return in 2019.

178. Greg Roman referred to the women who reported discrimination as “usurpers.”

179. Greg Roman made comments that usurpers will be dealt with.

180. There was also new allegations of sexually inappropriate comments that Greg Roman made about Marnie Meyer and Caitriona Brady’s father. Caitriona Brady was an intern who was offered employment after her internship. Caitriona Brady and Delaney Yonchek worked under Patricia McNulty and myself. Greg Roman made comments that Caitriona Brady got her job because Marnie Meyer was engaged in a sexual relationship with her father.

181. Matthew Bennett and Greg Roman tried to guess the name of the MEF female employee who was involved in the new allegations. They guessed that it was Gabrielle Bloom.

182. I never had any influence on money or grants. This was way above my pay grade. Daniel Pipes and Greg Roman alone made these decisions. All work I performed with Tommy Robinson was at the instruction of MEF, Greg Roman, and/or Daniel Pipes.

183. In reviewing the exhibits attached to Defendants’ fact statement it appears that I did not email the grant contract. I testified at deposition that I did not review it or read it. I did not email it either.

184. I had absolutely no supervisor role in connection with either the rally or the use of Forum funds. I certainly was not sent to report on the use of MEF funds.

185. There is not a single email or text message where I and any other individual spoke about me overseeing the rally or use of Forum funds. I used her own time and funds to finance the trip. MEF contributed only \$300.00 for my flight because I said I would attend the rally while there. I paid for everything else and used my personal time.

186. I did not know Daniel Thomas in June 2018 and the first time I met him was at the rally where we briefly said hello. We spent no time together during my trip to England in June 2018.

187. In October 2018, I was instructed as part of my job responsibilities to attend an event in the UK held for Tommy Robinson. I traveled to the UK strictly on MEF business.

188. I am not aware of MEF proving any money toward the October 2018 event. I am not swearing that it did not happen. If it did, I had no involvement.

189. I was not involved in any way in any money being granted to, or donated to Tommy Robinson after the free Tommy Robinson in June 2018. The only grant that I am aware of is the grant in June 2018.

190. I believe and therefore swear that MEF stopped all donations or assistance involving Tommy Robinson at some point before 2019.

191. When Daniel Thomas's father contacted me, I informed him that MEF could not help Daniel Thomas. I tried to be nice to the man, however, I explained that MEF does not do what Daniel Thomas's father was asking. MEF has never sent money to Daniel Thomas, other than the grant in June 2018 that Greg Roman and Marnie Meyer oversaw.

192. I did not author a proposal for Tommy Robinson. I was asked to look at it, which is what I was trained by Greg Roman to do. Greg Roman constantly helped people with proposals and information. There is nothing improper about review a proposal before it is sent to Daniel Pipes of Greg Roman for a decision.

193. I was asked by Janice Atkinson to speak at the European Parliament. I discussed in detail my involvement and speech topics. I noticed MEF about my travel plans and went on my personal time and expense. This was an approved and scheduled trip.

194. I was not involved in the Hopkins proposal outside of normal job responsibilities.

Plaintiff discussed the Hopkins proposal with Daniel Pipes many times. MEF did not fund the proposal.

195. Daniel Thomas was referring to money that I lent him to buy a jacket. Daniel Thomas was not referring to money that MEF granted him. I was embarrassed to take Daniel Thomas to an event because he was underdressed. I loaned Daniel Thomas money to buy clothes and a jacket and Daniel Thomas agreed to pay the loan back.

196. Also, Daniel Thomas asked me to buy an airline ticket and promised to pay me back. This is the money that Daniel Thomas referred to when he said he would pay me back.

197. I did not believe Jazmin Bishop when she lied about Daniel Thomas. I had already suspected that Daniel Thomas did not adequately account for all the money granted which is why I sent Greg Roman an email and explained that MEF should not do business with Daniel Thomas ever again.

198. There was no reason to believe that Jazmin Bishop's accusations were credible. I attempted to validate the accusations and was unable to confirm that anything Jazmin Bishop said was true.

199. To this day I have no direct knowledge of any money that was taken by Daniel Thomas. I do not know if he stole kept money for himself in manner that would violate the agreement between MEF and Daniel Thomas.

200. The Bring Your Own Device Agreement provided that employees were permitted to keep the computers as their personal devices. Because MEF had permitted Matthew Bennett to keep his laptop, without paying the balance, I thought the same would be done for female employees. I was wrong. My personal information including user names and passcodes was

stored in the computer. I did not save information on the hard drive. The computer was used to access cloud-based systems. There was no discoverable information on the computer.

201. I swear under penalty of perjury that the foregoing is accurate, true and correct.

Signature of Declarant: Lisa Barbounis

Name of Declarant: Lisa Barbounis

Date: April 17, 2021